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October 25, 2004

Ref: 2017-20950

Honorable James H. Welsh Commissioner of Conservation Post Office Box 94275 Baton Rouge, LA 70804-4275

Re.

Hearing Application M-1 Zone, Reservoir C

LAKE WASHINGTON FIELD, Plaquemines Parish, Louisiana

Applicant: Swift Energy Company

Dear Mr. Commissioner:

In accordance with the Rules of Procedure for Conducting Hearings Before the Commissioner of Conservation of the State of Louisiana, application is hereby made on behalf of **Swift Energy Company** the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of an order pertaining to the following matters relating to the M-1 Zone, Reservoir C in the Lake Washington Field, Plaquemines Parish, Louisiana:

- To redefine the M-1 RC SUA previously defined in Office of Conservation Order No. 149-X-4, effective January 6, 2004;
- To permit applicant, Swift Energy Company to drill, designate and utilize Swift Energy Company-State Lease 212 No. 122 as an alternate unit well for the M-1 RC SUA, such well to be at the location shown on the plat attached hereto and made a part hereof;
- To confirm the unit established by Office of Conservation Order No. 149-X-4, effective January 6, 2004;
- 4. To confirm Swift Energy Company as the operator of the M-1 RC SUA;
- 5. To make a specific finding that such proposed alternate unit well is necessary to effectively and efficiently drain a portion of the M-1 RC SUA which cannot be efficiently and economically drained by any other well within the unit;
- 6. To grant a single unit allowable for the M-1 RC SUA and to permit the operator of the unit to produce said unit allowable from the unit well, the proposed alternate unit well, or from both wells at its option;
- 7. To find that, except to the extent contrary to the order granted by the Commissioner of Conservation in connection with the hearing held on this application, the provisions of Office of Conservation No. 149-X-4 shall remain in full force and effect;

GAMD-laf:27300-1

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Hon. James H. Welsh October 25, 2004 Page 2-

- 8. To provide that the Commissioner of Conservation should be authorized to reclassify the sand and reservoir by supplemental order without the necessity of a public hearing if the producing characteristics of each reservoir changes and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation, and
- 9. To consider such other matters which may be pertinent to this application as shown by the evidence presented at the hearing held on this matter.

The M-1 Sand, Lake Washington Field, Plaquemines Parish, Louisiana was previously defined in Office of Conservation Order No. 149-X-4, effective January 6, 2004 and is redefined as being that oil and gas bearing zone encountered between the measured depths of 4,579 feet (-4528' subsea) and 4,728 feet (-4669' subsea) (electrical log measurements) in Swift Energy Company-State Lease 212 No. 122 Well, located in Section 13, Township 20 South, Range 26 East.

In accordance with the Rules of Procedure for Conducting Hearings Before the Commissioner of Conservation of the State of Louisiana, the Commissioner of Conservation, the District Manager of the Lafayette District of the Office of Conservation and all interested owners, represented parties and interested parties known to the applicant after a reasonable search were notified in writing in the pre-application notice dated October 15, 2004 that a conference to discuss the proposed application was tentatively scheduled for 10:00 a.m. on Thursday, November 11, 2004. It was stated at that time that this conference would be held only if a request to confer were received by the undersigned within ten (10) calendar days after the date of the pre-application notice. No requests to confer were received either in writing or by telephone and, in accordance with the Rules of Procedure, the tentatively scheduled conference WILL NOT BE HELD.

Attached hereto and made a part hereof is a plat outlining the M-1 RC SUA, showing the location of the alternate unit well together with a list of the names and addresses of all interested owners, interested parties and represented parties who are known to the applicant after reasonable search. A reasonable effort was made to ascertain the names and addresses of all such parties.

A copy of the list of the names and addresses of the interested owners, represented parties and interested parties is not being mailed to those parties along with this hearing application. Should any such party desire a copy of this list, however, we will be glad to provide one upon request.

Upon receipt of the legal notice in the captioned matter, the notice will be posted, published and mailed in accordance with Rule 7 of the Rules of Procedure.

Any pertinent data relating to the proposed unit can be obtained, AT THE COST OF THE REQUESTING PARTY, from Mr. Remy Williams of W. H. Robbins & Associates, 302 LaRue France Lafayette, La 70508 (337) 232-5004.

Finally, there is enclosed herewith our check on behalf of the applicant in the amount of \$755.00, made payable to the Office of Conservation, representing the required hearing application fee.

Very truly yours,

My hat

BJD/ht Attachments

c: Mr. Richard Hudson
District Manager
Office of Conservation

All Interested Owners, Represented Parties and Interested Parties

